

6/7/06 JOHN R. HALLE
AMERICENTER, ET AL. V HALLE

STATE OF NEW HAMPSHIRE

HILLSBOROUGH, SS.

SUPERIOR COURT

NORTHERN DISTRICT

04-C-173

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AMERICENTER OF BLOOMFIELD, LP,

AMERICENTER OF TROY, LP,

AMERICENTER OF SOUTHFIELD, LP,

AMERICENTER OF LIVONIA, LP,

CAMBRIDGE CENTER WEST, LP

v.

JOHN HALLE

* * * * *

DEPOSITION OF JOHN R. HALLE

Taken at the offices of Sheehan, Phinney,
Bass + Green, 1000 Elm Street, Manchester,
New Hampshire, on Wednesday, June 7, 2006,
commencing at 5:44 p.m.

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<p>1 Q. Do you recall then transferring that property to 2 your wife? 3 A. I could have, yeah. 4 Q. Do you recall why you would have done that, if you 5 did? 6 A. You know, when my wife -- when we had the kids and 7 my wife stopped working -- I don't know if you 8 have the same situation. I don't know if your 9 wife works. But, you know, my wife was a good 10 earner before we had kids. And she felt, I don't 11 know, she didn't have any earning power and she 12 wanted some security. And she's always owned my 13 houses. 14 Q. Why do you do that? 15 A. You know, it makes good sense. You know, it's the 16 place -- you know, for litigation purposes, like 17 we're here today, I mean, it's not a bad place, 18 you know, to protect your -- you know, your 19 assets. 20 There's nothing wrong, there's nothing 21 against the law with protecting your assets. You 22 didn't have a judgment in 2000, so it's not like 23 you're going to go and imply some type of, you</p>	<p>1 to -- you know, at that time, I had my first child 2 and my wife was pregnant for the second child and, 3 you know, there was tension in the marriage at the 4 time. 5 So I think that, you know, my father said -- 6 you know, my father wanted to make sure that, you 7 know, if it came to a divorce between the two of 8 us, that these assets would be protected; and 9 that, you know, he didn't distribute to, you know, 10 his future, you know, ex-daughter-in-law. 11 So I think, if I remember correctly, you 12 know, I think that that was the purpose of the 13 thing, of the event. 14 Q. Well, did the trust buy 3 Dupuis Circle or did you 15 buy 3 Dupuis Circle? 16 A. I don't know. I think the trust bought it. 17 Q. And were you a beneficiary of that trust? 18 A. I think I might have been a beneficiary of the 19 trust. Again, you know, I mean, you're reaching 20 into... 21 Q. Does the Monique Halle Realty Trust still exist? 22 A. I don't think it does. 23 Q. Who would know?</p>
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<p>1 know, fraudulent conveyance case. But, you 2 know... 3 Q. If I represented to you that, on the same day that 4 you received 3 Dupuis Circle from the Monique 5 Halle Realty Trust, that you then transferred it 6 immediately to your wife, and then your wife 7 transferred it out immediately to a third party, 8 do you have any idea why that would be? 9 A. It would have been for tax reasons, one or the 10 other. That's why, when you said to me February 11 of 2000, you know, I took title, I had no idea 12 why. 13 Q. Why would the Monique Halle Realty Trust be 14 issuing property to you? 15 A. Remember the Exeter Road, which is the house 16 before that? 17 Q. Mm-hmm. 18 A. So this is -- and, you know, so at the time, 19 that's the first house that I bought. And my 20 father, I think, he gave me \$40,000. And I think 21 he lent me the money, the difference, you know, 22 for that house. 23 And so the reason it went into the trust is</p>	<p>1 A. Monique Halle would. 2 Q. And so, if you're a beneficiary of that trust, you 3 don't know it as you sit here today? 4 A. Correct. My parents keep their affairs, you know, 5 pretty tight. I'd be very surprised if the 6 Monique Halle Realty Trust exists. 7 Q. Do you know who the trustees of the Monique Halle 8 Realty Trust were? 9 A. My brother Louis would probably be the trustee of 10 the Monique Halle Realty Trust. 11 Q. Where does Louis live? 12 A. In Portsmouth, New Hampshire. 13 Q. I take it he would know if you're a beneficiary or 14 not. 15 A. Yes. I think, you know, this document, it's clear 16 or either that it jogs my -- I would assume that I 17 would be, you know, the only beneficiary of the 18 Monique Halle Realty Trust. 19 Q. Do you know of any other assets that were ever in 20 the Monique Halle Realty Trust? 21 A. I think that the only asset was the Dupuis Circle 22 house. 23 Q. You think the trust was dissolved upon the</p>